IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JONATHAN I. GEHRICH, ROBERT LUND, COREY GOLDSTEIN, PAUL STEMPLE and CARRIE COUSER, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

CHASE BANK USA, N.A., and JPMORGAN CHASE BANK, N.A.,

Defendants.

NO. 1:12-CV-5510

Honorable Gary Feinerman

PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND FOR CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS

Plaintiffs respectfully request that the Court enter an order preliminarily approving the parties' proposed class settlement and approving conditional certification of the proposed "Settlement Class" in this matter. A draft order is attached to Plaintiffs' memorandum. *See* Ex. A to Memorandum (Settlement Agreement) at Exhibit E. In further support of this motion, Plaintiffs state:

- 1. This is a Telephone Consumer Protection Act, 47 USC 227 case, alleging improper calls and text messages to cell phones.
- 2. After multiple mediation sessions, the parties are pleased to notify the Court that they have reached a global class resolution of this matter.

- 3. Plaintiffs respectfully submit a memorandum in support of this motion, which includes a proposed order granting preliminary approval. *See* Memorandum, Ex. A (Settlement Agreement) at Exhibit E.
 - 4. Defendants do not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter an order preliminarily approving the parties' proposed class settlement and approving conditional certification of settlement class.

RESPECTFULLY SUBMITTED AND DATED this 7th day of August, 2014.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Beth E. Terrell, Admitted Pro Hac Vice

Beth E. Terrell, Admitted Pro Hac Vice

Email: bterrell@tmdwlaw.com

Michael D. Daudt, Admitted Pro Hac Vice

Email: mdaudt@tmdwlaw.com 936 North 34th Street, Suite 400 Seattle, Washington 98103-8869

Telephone: (206) 816-6603

Facsimile: (206) 350-3528

Alexander H. Burke

Email: aburke@burkelawllc.com BURKE LAW OFFICES, LLC 155 North Michigan Avenue, Suite 9020

Chicago, Illinois 60601 Telephone: (312) 729-5288 Facsimile: (312) 729-5289

Syed Ali Saeed, Admitted Pro Hac Vice

Email: ali@sllawfirm.com SAEED & LITTLE, LLP 1433 North Meridian Street, Suite 202

Indianapolis, Indiana 46202

Telephone: (317) 614-5741 Facsimile: (888) 422-3151

Gayle M Blatt

Email: gmb@cglaw.com

CASEY, GERRY, SCHENK, FRANCAVILLA,

BLATT & PENFIELD LLP

110 Laurel Street

San Diego, California 92101-1406

Telephone: (619) 238-1811 Facsimile: (619) 544-9232

Mark D. Ankcorn

Email: mark@ankcorn.com ANKCORN LAW FIRM, PC 11622 El Camino Real, Suite 100 San Diego, California 92130 Telephone: (619) 870-0600

Facsimile: (619) 684-3541

Joshua B Swigart

Email: josh@westcoastlitigation.com

HYDE AND SWIGART

411 Camino Del Rio South, Suite 301 San Diego, California 92108-3551

Telephone: (619) 233-7770 Facsimile: (619) 297-1022

Matthew M. Loker

Email: ml@kazlg.com

KAZEROUNI LAW GROUP APC

2700 North Main Street Suite 1000

Santa Ana, California 92705 Telephone: (800) 400-6808 Facsimile: (800) 520-5523

Seyed Abbas Kazerounian

Email: ak@kazlg.com

KAZEROUNI LAW GROUP APC

245 Fischer Avenue, Suite D1

Costa Mesa, California 92626

Telephone: (800) 400-6808 Facsimile: (800) 520-5523

Todd M Friedman

Email: tfriedman@attorneysforconsumers.com

LAW OFFICES OF TODD M. FRIEDMAN PC 369 South Doheny Drive, Suite 415 Beverly Hills, California 90211 Telephone: (877) 206-4741

Facsimile: (866) 623-0228

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on August 7, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kenneth Michael Kliebard

Email: kkliebard@morganlewis.com

Tedd Macrae Warden

Email: twarden@morganlewis.com MORGAN LEWIS & BOCKIUS LLP

77 West Wacker Drive

Chicago, Illinois 60601-5094 Telephone: (312) 324-1774 Facsimile: (312) 324-1001

Julia B. Strickland

Email: jstrickland@stroock.com

Lisa M. Simonetti

Email: lsimonetti@stroock.com

Arjun P. Rao

Email: arao@stroock.com

STROOCK & STROOCK & LAVAN LLP

2029 Century Park East Suite 1600 Los Angeles, California 90067-3086

Telephone: (310) 556-5800 Facsimile: (310) 556-5959

Attorneys for Defendants

DATED this 7th day of August, 2014.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Beth E. Terrell, Admitted Pro Hac Vice

Beth E. Terrell, Admitted Pro Hac Vice

Email: bterrell@tmdwlaw.com 936 North 34th Street, Suite 400 Seattle, Washington 98103-8869

Telephone: (206) 816-6603 Facsimile: (206) 350-3528

Attorneys for Plaintiffs